UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

------ X
In re: : Chapter 11

SEARS HOLDING CORPORATION, et al., : Case No. 18-23538 (RDD)

Debtor. : NOTICE OF APPEARANCE AND

: REQUEST FOR SERVICE OF

: PAPERS

PLEASE TAKE NOTICE that BLEUS & ASSOCIATES, LLC hereby submits this Notice of Appearance and Request for Service of Papers and, pursuant to 11 U.S.C. § 1109(b) and Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") appears in the case of the above-captioned debtors as counsel to Taylor Sorensen, as the Personal Representative of the Wrongful Death Estate of Jonathan Sorensen, Deceased, ("Sorensen"), and requests that all notices and pleadings given or required to be given and all papers served in the above captioned cases, be delivered to and served upon the counsel identified below at the following address. In addition, it is respectfully requested that pursuant to Rule 2002(g) of the Bankruptcy Rules, the following also be added to the Master Service List:

George Anthony Bleus, Esq. BLEUS & ASSOCIATES, LLC Attorneys at Law 2633 Dakota NE Albuquerque, NM 87110 Tel: 505-884-9300

Fax: 505-884-9305

Email: bleusandassociates@gmail.com

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 2002 and 9010(b) of the Bankruptcy Rules, the foregoing request includes, without limitation, all orders and notices, including, but not limited to, applications, motions, petitions, pleadings, requests,

complaints, demands, replies, answers, orders to show cause, schedules of assets and liabilities, statements of affairs, operating reports and plans, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, hand delivery, telephone, telegraph, telex, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that if any limited service lists are used in this proceeding, the undersigned requests inclusion thereon.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not constitute a submission by SISF to the jurisdiction of the Bankruptcy Court. This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed or construed to waive any of SISF's substantive or procedural rights, including, without limitation: (i) the right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related to this case; (iii) the right to have the reference withdrawn by the United States District Court for this district in any matter subject to mandatory or discretionary withdrawal or the right to seek abstention in favor of any state court; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which SISF is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. Nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: May 14, 2019 at Albuquerque, New Mexico.

Respectfully submitted by:

BLEUS & ASSOCIATES, LLC

Henry Anthy Blue Esq.

George Anthony Bleus, Esq.

Nghiem Nguyen, Esq.

Attorneys at Law

2633 Dakota St NE

Albuquerque, NM 87110 Telephone: (505) 884-9300

Facsimile: (505) 884-9305

E-mail: <u>bleusandassociates@gmail.com</u>